

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ADAM FERRARI

Plaintiff,

v.

WILLIAM FRANCIS

Defendant.

Case No. 3:23-cv-00455-S

**JOINT MOTION FOR ENTRY OF AMENDED AGREED PROTECTIVE
ORDER AND REQUEST FOR EXPEDITED CONSIDERATION**

Pursuant to Federal Rule of Civil Procedure 26 and the Court's inherent authority to manage the discovery process, Plaintiff Adam Ferrari and Defendant William Francis respectfully request that the Court enter in this case the Amended Agreed Protective Order attached hereto as Exhibit A.

The Parties have reached an agreement in principle that would result in a Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii). A material term of that agreement, and a precondition to the stipulation, is that the Court enter an Amended Agreed Protective Order (Exhibit A) that would replace the Agreed Protective Order previously entered in this case (Dkt. 54). The purpose of the amendment is to remove the document deletion requirement and thus save the parties significant expense should future disputes arise.

Importantly, the parties seek to enter the Amended Agreed Protective Order before the deadline for dispositive motions in this case (**Monday, May 12, 2025**) so that the Parties can stipulate to dismiss the matter and avoid any additional activity relating to summary judgment. The Parties appreciate the Court's expedited attention to this matter.

AGREED AS TO FORM AND SUBSTANCE

Dated: May 8, 2025

By: /s/ Cortney C. Thomas

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PROOF OF SERVICE

I hereby certify that a true and correct copy of Adam Ferrari's Motion to Dismiss Pursuant to Fed. R. Civ. P. 41(a)(2) was served on the below counsel on May 8, 2025 via email.

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Attorneys for William Francis

Dated: May 8, 2025

/s/ David Y. Sillers
David Y. Sillers

CERTIFICATE OF CONFERENCE

I have conferred repeatedly with Cort Thomas, counsel for Defendant, and we agree that this Amended Agreed Protective Order would allow the parties to move forward with a Stipulation of Dismissal.

Dated: May 8, 2025

/s/ David Y. Sillers
David Y. Sillers, Attorney for Plaintiff